

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO: 3:07-cr-79-WKW
)	
JAN PUGH THOMPSON)	

UNOPPOSED MOTION TO CONTINUE

NOW COMES the Defendant, by and through the undersigned counsel, Christine A. Freeman, and pursuant to 18 U.S.C. § 3161(h), and respectfully moves this Court to move this matter from the August 6 trial docket.

In support of this Motion, defendant would show:

1. Ms. Thompson is indicted for misappropriation of an amount under \$4,000. The true owner(s) of these funds have already received some or all of these funds, prior to the filing of this Indictment.
2. A continuance of the August 6 trial date is necessary to allow adequate time to pursue a pretrial diversion request. Counsel anticipates that such a request will be completed and submitted to the United States Attorney by July 16.
3. Counsel for the prosecution has authorized undersigned counsel to state that the prosecution does not oppose this motion.

WHEREFORE, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
CHRISTINE A. FREEMAN

TN BAR NO.: 11892

Attorney for Jan Pugh Thompson

Federal Defenders

Middle District of Alabama

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Nathan D. Stump, Esquire
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104

Respectfully submitted,

s/Christine A. Freeman

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